Coon Creek Telephone Company

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DUANE ANDREW, Manager

March 10, 2014

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90, Expression of Interest

Ms. Dortch;

Coon Creek Telephone Company (Coon Creek) hereby provides this "Expression of Interest" in conjunction with the Commission's order[1] initiating rural broadband experiments to provide robust, scalable high-speed broadband to unserved locations in high-cost areas.

Background

Coon Creek is an incumbent local exchange carrier (ILEC) and provides voice, video and data service to its customers in Eastern Iowa. The company has 7 employees and has provided telecommunication services to rural Iowa customers since 1918. Today, Coon Creek provides voice, video, and data services to its customers located in the Blairstown, Iowa telephone exchange. Coon Creek also provides communication services in the Belle Plaine and Marengo, Iowa telephone exchanges as a competitive local exchange carrier (CLEC). Coon Creek is an eligible telecommunications carrier (ETC).

Description of the Project

Broadband service has become the most sought after technology by Coon Creek's rural customers. Customers in the rural areas surrounding Blairstown, Belle Plaine, and Marengo, Iowa do not have access to high speed broadband networks. Coon Creek seeks to expand its network and intends to deploy FTTH technology to the unserved eligible locations within its ILEC and CLEC service territory as indicated below.

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[1] See Technology Transitions et al., GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 20 14).

Proposed Technology

Coon Creek will initially deploy a FTTH network using fiber electronics capable of providing broadband in a range of service options up to one (1) Gigabit Ethernet (GE) service. Greater broadband speeds are achievable with current technology and will be deployed to meet demand on an as needed basis. A network interface device will be installed at each customer location and will be equipped with battery backup capability in case of electrical power outages.

Coon Creek's proposed solution will be deployed over a FTTH system designed to deliver 2.1 Gbps through either a Gigabit Passive Optical Network (GPON) solution or an Active Gigabit Ethernet (GE) solution using the same platform. This system allows the flexibility to meet current and future bandwidth requirements of video, data and voice and easily move to full GE solution if required.

Coon Creek's system will also be scalable to a ten (10) gigabit capacity by simply changing out optical electronics within the deployed system. This allows Coon Creek to increase bandwidth capacity to residential customers, businesses, or anchor institutions to meet future bandwidth demands. In addition, the proposed fiber is capable of providing 100 gigabit connections over 40 wavelengths with today's technology. Once fiber is deployed, the only limitations are the developed electronics available in the market place.

Geography and Eligible Locations

Coon Creek Telephone proposes to build a FTTH network to 354 eligible high cost locations in price cap territories and an additional 135 eligible high cost locations in its ILEC rate of return area. The census tracts for the proposed service territories are indicated below:

State	County Name	Census Tract	Eligible Locations	Extremely High Cost Locations	Total Proposed Locations
Price Cap Service Territory:					
IA	Benton	19011960600	74	11	85
IA	Benton	19011960700	18	0	18
IA	Iowa	19095960200	247	43	145 [1]
IA	Powershiek	19157370100	44	17	31 [1]
IA	Tama	19171290600	634	119	75 [1]
	Total		**1017**	**190**	**354**

1 – Total proposed locations are estimated portions of census tracts the company is able to serve.

State	County Name	Census Tract	Eligible Locations
Rate of Return Service Territory:			
IA	Benton	19011960600	135
	Total		**135**

Anchor Institutions

Based on the proposed service area, there are no anchor institutions that are incapable of accessing broadband service at a minimum speed of 3 Mbps downstream / 768 kbps upstream. However, deployment of high speed broadband service will enable these rural customers to access information and services currently offered by anchor institutions as well as commercial businesses. The agriculture industry has become extremely reliant on broadband service for its day-to-day operations. Educational institutions in Iowa are implementing laptop programs which provide students with laptop computers to enhance their educational experience. Without access to high speed broadband service, these students are left behind.

Partnerships

Coon Creek will utilize its existing middle mile infrastructure to minimize construction cost. The company also has connections to a regional and a statewide fiber optic network which provides connectivity to internet backbone providers.

Proposed Services

Coon Creek will offer Data, Voice, and Video services to customers within the proposed rural census tracts. The company will offer broadband service at a minimum speed of 10 Mbps with various service tiers up to 1 Gbps depending on demand. Additional tiers will be added as demand for those services becomes evident.

Project Cost / Funding

The estimated construction cost is a high level estimate based on historical data. The total estimated construction cost for census tracts in price cap service territories is $2,301,000, and $877,500 for census tracts in the rate of return service territory. Coon Creek is requesting one-time funding for both the price cap service territory and rate of return service territory of $3,178,500.

Coon Creek Telephone appreciates the opportunity to provide this expression of interest for funding of rural broadband experiments. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Duane Andrew
Duane Andrew
General Manager